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7 *Attorneys for Google LLC*

8 UNITED STATES DISTRICT COURT

9 NORTHERN DISTRICT OF CALIFORNIA

10 SAN FRANCISCO DIVISION

11 GOOGLE LLC,

12 Plaintiff,

13 vs.

14 SONOS, INC.,

15 Defendant.

CASE NO. 3:20-cv-06754-WHA

Related to CASE NO. 3:21-cv-07559-WHA

**DECLARATION OF JOCELYN MA IN
SUPPORT OF GOOGLE LLC'S
ADMINISTRATIVE MOTION TO SEAL
PORTIONS OF THE PARTIES' JOINT
DISCOVERY LETTER**

I, Jocelyn Ma, declare and state as follows:

1. I am an attorney licensed to practice in the State of California and am admitted to practice before this Court. I am an associate at Quinn Emanuel Urquhart & Sullivan LLP representing Google LLC (“Google”) in this matter. I have personal knowledge of the matters set forth in this Declaration, and if called as a witness I would testify competently to those matters.

2. I make this declaration in support of Google’s Administrative Motion to File Under Seal Portions of the parties’ Joint Discovery Letter regarding Google’s Interrogatories Nos. 11, 13, and 18 and Request for Production No. 58 (“Joint Discovery Letter”). If called as a witness, I could and would testify competently to the information contained herein.

3. Google seeks an order sealing the materials as listed below:

Document	Portions to be Filed Under Seal	Designating Party
Joint Discovery Letter	Portions highlighted in green	Google and Sonos, Inc. (“Sonos”)
Joint Discovery Letter Exhibit 1 (“Exhibit 1”)	Portions highlighted in green	Google and Sonos

4. The portions of the parties’ Joint Discovery Letter and Exhibit 1 highlighted in green contain confidential business information, including terms to a confidential agreement and details regarding Google’s business partnerships that are not public. Public disclosure of this information would harm Google’s competitive standing and its ability to negotiate future agreements by giving competitors access to Google’s highly confidential business thinking and asymmetrical information about Google’s collaboration strategies and partnerships with other entities. If such information were made public, I understand that Google’s competitive standing would be significantly harmed. I also understand that a less restrictive alternative than sealing the green-highlighted portions of the parties’ Joint Discovery Letter would not be sufficient because the information sought to be sealed is Google’s proprietary and confidential business information but is necessary to the parties’ Joint Discovery Letter.

1 I declare under penalty of perjury under the laws of the United States of America that to the
2 best of my knowledge the foregoing is true and correct. Executed on October 14, 2022, in San
3 Francisco, California.

4 DATED: October 14, 2022

5 By: /s/ Jocelyn Ma

6 Jocelyn Ma

ATTESTATION

I, Charles K. Verhoeven, am the ECF user whose ID and password are being used to file the above Declaration. In compliance with Civil L.R. 5-1, I hereby attest that Jocelyn Ma has concurred in the aforementioned filing.

DATED: October 14, 2022

/s/ Charles K. Verhoeven

Charles K. Verhoeven